

SALEM COUNTY CORRECTIONAL FACILITY
~~FREDY ESTUARDO VELASQUEZ~~
125 CEMETARY ROAD
WOODSTOWN, NEW JERSEY 08098

IN THE FEDERAL COURT OF THE UNITED STATES
FOR THE DISTRICT OF DELAWARE

THE UNITED STATES, :
Plaintiff, :
Vs. : Criminal Action # *07-11-JJF*
FREDY ESTUARDO VELASQUEZ :
Defendant, :

NOTICE FOR CONTINUANCE

Ilana H. Einsentein
Assistant U.S. Attorney
1007 Orange St., Suite 700
Wilmington, DE 19899-2046

Dear Ms.

PLEASE TAKE A NOTICE, that upon the duly verified affidavit of Freddy Estuardo Velasquez, and upon all the proceedings had herein, a motion will be made at a term of the Court held at the United States District Courthouse.

For an Order granting the Defendant, a continuance of the trial herein for a period of 60 days, a reasonable time to take such further and necessary steps to adequately prepare my case for trial.

Respectfully submitted,

Freddy Estuardo Velasquez
Freddy Estuardo Velasquez,
Defendant Pro- Se.

Dated: May 9, 2007

SALEM COUNTY CORRECTIONAL FACILITY
██████████ FREDY ESTUARDO VELASQUEZ
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WOODSTOWN, NEW JERSEY 08098

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MAY 14 2007

IN THE FEDERAL COURT OF THE UNITED STATES
FOR THE DISTRICT OF DELAWARE

THE UNITED STATES, :
Plaintiff, :
Vs. : Criminal Action # 07-11-JJF
FREDY ESTUARDO VELASQUEZ :
Defendant, :

MOTION FOR CONTINUANCE

NOW COMES, Defendant, Fredy Estuardo Velasquez, (hereinafter defendant), through Pro-Se, and respectfully moves this Honorable Court for a 60 day continuance of the next hearing date in the instant case, in order to insure the defendant his Fifth Amendment right to due process of law and a fair trial. In support thereof, counsel respectfully shows to the court the following:

- Defendant, state that the age and complexity of the case and the delay of the government to produce a discovery, makes it unreasonable to expect adequate preparation in the defense.
- Documents and/or papers material to the preparation and trial of this cause are currently unavailable, to wit: The original copy of the birth certificated of the defendant.
- The absence of said documents and/or papers is not due to any negligence on the part of the Defendant or his counsel.
- Further, the Defendant, agree that the period of time reflected in this continuance is excludable pursuant to 18 USCA section 3161 (h) (8) from the time period within the trial must commence as set forth in 18 USCA section 3161 (c) (1).

WHEREFORE, the Defendant, respectfully moves this Honorable Court for an Order granting a continuance of this case.

Respectfully submitted,

Freddy Estuardo Velasquez
Freddy Estuardo Velasquez,
Defendant Pro- Se.

Dated: May 9, 2007

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IN THE FEDERAL COURT OF THE UNITED STATES
FOR THE DISTRICT OF DELAWARE

THE UNITED STATES ,

Plaintiff

*

* **Criminal action # 07-11-JJF**

Vs.

*

FREDDY ESTUARDO VELASQUEZ*

Defendant.

TO: Honorable Judge Joseph J. Farnan, Jr.
United States District Judge
District of Delaware
844 King Street
Wilmington, DE 19801

AFFIDAVIT IN SUPPORT OF DEFENDANT'S MOTION FOR
CONTINUANCE

1. The affiant asserts that documents and /or papers material to the preparation of his defense are currently unavailable, such as the following information listed below:

A. AN ORIGINAL COPY OF DEFENDANT'S BIRTH CERTIFICATE.

2. Defendant sworn that the time of this continuance would be enough time to prepare his defense and that all the material that is unavailable at this time it is going to be produce at that time.

WHEREFORE, I attest that the information presented in this affidavit is true and correct to best of my ability.

Respectfully submitted,

Freddy Estuardo Velasquez

Freddy Estuardo Velasquez
Defendant Pro-Se.

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IN THE FEDERAL COURT OF THE UNITED STATES
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THE UNITED STATES ,

Plaintiff

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* **Criminal action # 07-11-JJF**

Vs.

*

FREDDY ESTUARDO VELASQUEZ*

Defendant.

TO: Honorable Judge Joseph J. Farnan, Jr.
United States District Judge
District of Delaware
844 King Street
Wilmington, DE 19801

ORDER

AND NOW, TO WIT, this _____ day of May 2007, A.D., defendant
Freddy Estuardo Velasquez, Motion For Continuance with Affidavit In Support having
been duly heard and considered.

Honorable Judge Joseph J. Farnan, Jr.